

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IRENE SIMMONS AND RODELL	)	
SANDERS, for themselves and others	)	Case No. 1:20-CV-1128
similarly situated,	)	
	)	
Plaintiffs,	)	Judge John J. Tharp Jr.
	)	
v.	)	Magistrate Judge Jeannice W. Appenteng
	)	
MOTOROLA SOLUTIONS, INC., and	)	
VIGILANT SOLUTIONS, LLC,	)	
	)	
Defendants.	)	

**STIPULATION OF DISMISSAL  
UNDER FED. R. CIV. P. 41(a)(1)(A)(ii)**

IT IS HEREBY STIPULATED AND AGREED to by Plaintiffs Irene Simmons and Rodell Sanders and Defendants Motorola Solutions, Inc. and Vigilant Solutions, LLC, through their respective counsel, that under Federal Rule of Civil Procedure 41(a)(1)(A)(ii), this action shall be and hereby is dismissed in its entirety and with prejudice.

DATED: October 28, 2025

PLAINTIFFS IRENE SIMMONS and  
RODELL SANDERS

/s/ Michael I. Kanovitz  
One of their attorneys

Jonathan I. Loevy  
Michael I. Kanovitz  
LOEVY & LOEVY  
311 N. Aberdeen, 3rd Floor  
Chicago, Illinois 60607  
312.243.5900  
jon@loevy.com  
mike@loevy.com  
***Counsel for Plaintiffs***

DEFENDANTS MOTOROLA SOLUTIONS,  
INC. and VIGILANT SOLUTIONS, LLC

/s/ David C. Layden  
One of their attorneys

David C. Layden  
Andrew W. Vail  
JENNER & BLOCK LLP  
353 North Clark Street  
Chicago, Illinois 60654-3456  
(312) 222-9350  
dlayden@jenner.com  
avail@jenner.com  
***Counsel for Defendants***

**CERTIFICATE OF SERVICE**

I, Michael Kanovitz, an attorney, hereby certify that, on October 28, 2025, I filed the foregoing document using the Court's CM/ECF system, which effected service on all counsel of record.

By: /s/ Michael I. Kanovitz  
One of Their Attorneys